

**REMARKS**

The Examiner is thanked for the performance of a thorough search.

I. STATUS OF CLAIMS

Claims 1, 23, 26, and 29 have been amended. Claims 2 and 3 have been canceled. No claims have been added. Hence, Claims 1, 5-7, 9-16, 18-23, 26, 29, and 32-33 are currently pending in the application.

The features of now canceled Claim 2 have been incorporated in Claim 1. Thus, the amendment to Claim 1 introduced herein does not require a new search.

Each issue raised in the Office Action mailed on August 5, 2005 is addressed hereinafter.

II. REJECTIONS BASED ON THE CITED ART

A. INDEPENDENT CLAIM 1

Independent Claim 1 has been rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Harrison et al., U.S. Patent No. 6,611,725 (“HARRISON”) in view of non-patent article “SVG Basic Example” by Ken Sall (“SALL”), and further in view of non-patent article “Integration by Parts: XSLT, XLink and SVG” by Didier Martin (“MARTIN”). Further, the now canceled Claim 2, the features of which have been herein incorporated into Claim 1, has been rejected under 35 U.S.C. §103(a) as allegedly unpatentable over HARRISON in view of SALL, further in view of MARTIN, and further in view of Lewallen, U.S. Patent No. 6,675,230 (“LEWALLEN”). The rejection of Claim 1 is respectfully traversed.

Claim 1 recites:

...  
inserting into the SVG document a reference to a second document type definition file, said second document type definition file defining a **binding element with an attribute for referencing a resource through a pointer**, wherein the resource includes information pertaining to the object;

**wherein the resource is a database and the pointer includes a query for a data item in the database; and  
binding to the SVG statements the pointer to the resource from an instance of the binding element.**

It is respectfully submitted that HARRISON, SALL, MARTIN, and LEWALLEN, whether taken alone or in combination, do not describe or suggest the features of Claim 1 highlighted above.

1. None of HARRISON, SALL, MARTIN, and LEWALLEN describes of suggests the feature of Claim 1 of a second DTD file defining a binding element with an attribute for referencing a resource through a pointer, wherein the resource is a database and the pointer includes a query for a data item in the database.

The Office Action asserts that the feature of Claim 1 of a second DTD defining a binding element with an attribute for referencing a resource through a pointer is described in page 2 of MARTIN. Further, the Office Action asserts that in col. 9, lines 9-24, LEWALLEN describes the feature of Claim 1 of wherein the resource is a database and the pointer includes a query for a data item in the database. This is incorrect.

**Second DTD Defining a Binding Element with an Attribute for Referencing a Resource Through a Pointer**

The Office Action seems to assert that the container of locators described in MARTIN corresponds to the binding element featured in Claim 1. This is incorrect.

In its relevant portion, page 2 of MARTIN states:

To model this containment relationship, we'll use the XLink domain language. XLink is a fast-maturing W3C standard for describing links between (and inside) documents in XML. In particular, for our containment relationship, we will use **the xlink:extended construct, which itself is a container of locators**. A part containing other parts is a collection. Thus, in our model, a part containing other parts will inherit from the xlink:extended features and become a collection element containing locators. **A part contained in another part inherits from the xlink:locator features and then becomes an element contained in a collection.**

Each element contained in the collection points to a portion of the illustration (the SVG document). (Emphasis added.)

While the above passage may be teaching a mechanism for describing links between XML documents by using linking construct (the *xlink:extended* construct), nothing in the above passage teaches or suggests a **DTD that defines a binding element with an attribute for referencing a resource through a pointer**, as featured in Claim 1. Specifically, while the above passage may be describing the linking construct as a container of locators, nothing in the above passage or in any other passage of MARTIN teaches or suggests that the locators may be **attributes** of the linking construct, where the **attributes** are used for referencing a database resource through a pointer. In fact, MARTIN expressly states that the locators in the container of locators are **elements** that are instantiated and inherit features from the *xlink:locator* construct.

For the above reason, it is respectfully submitted that the container of locators described in MARTIN does NOT correspond to the binding element feature of Claim 1. Furthermore, the Office Action does not assert that the binding element feature of Claim 1 is described in any of HARRISON, SALL, or LEWALLEN.

**The Resource is a Database and the Pointer Includes a Query for a Data Item  
in the Database**

The Office Action asserts that the features of Claim 1 of a resource that is a database and a pointer that includes a query for a data item in the database are described in col. 9, lines 9-24 of LEWALLEN. This is incorrect.

First, as discussed above, none of HARRISON, SALL, MARTIN or LEWALLEN describes a binding element with attributes for referencing a resource, as featured in Claim 1. Since LEWALLEN does not describe a binding element with attributes for referencing a resource, LEWALLEN cannot possibly describe a binding element attribute for referencing a resource **through a pointer**, where the **pointer includes a query** for a data item in a database.

Second, the passage in col. 9, lines 9-24 of LEWALLEN does NOT describe an attribute for referencing a data item in database through a pointer that includes a query for a data item in a database, as featured in Claim 1. Specifically, in col. 9, lines 9-24, LEWALLEN states:

Further, with the preferred embodiment architecture, the Java developer may expose data in any object accessible to the user interface, including DOM trees, to java tools. For instance, **the mixed statement program may include Java Database Connectivity (JDBC\*\*) calls to perform queries to access data from a database.** The program could then include W3C API interface calls to insert database records returned from the JDBC calls into the DOM for a displayed HTML page to display the returned data in the HTML page. Alternatively, the mixed statement program may call a Java Bean application to perform various calculations or operations on data, and then include W3C API interfaces to insert the results of the operation from the Java program in the HTML DOM to display in the web page. (Emphasis added.)

While the above passage may be describing a mixed statement program that includes JDBC calls to perform queries to access data from a database, the above passage does not teach or suggest that statement or a JDBC call may be a pointer stored in a binding element attribute for referencing the database, as featured in Claim 1. On the contrary, the statements and JDBC calls in LEWALLEN are part of a mixed statement program written in Java or other programming languages. (LEWALLEN, col. 5, lines 3-11.) Thus, the statements or JDBC calls that may include queries to access data are basically executable lines of code written in a particular programming language, and are NOT pointers stored in a binding element attribute for referencing a resource, as featured in Claim 1.

For the above reasons, LEWALLEN does not teach or suggest the features of Claim 1 of a resource that is a database and a pointer that includes a query for a data item in the database.

2. There is no suggestion or motivation to combine MARTIN with LEWALLEN.

In attempting to show suggestion or motivation to combine MARTIN with LEWALLEN, the Office Action states in page 10:

It would have been obvious to one of ordinary skill in the art at the time of the invention to modify Harrison in view of Sall and Martin to include queries to access data from a database as taught by LEWALLEN, providing the benefit of an improved platform to allow Java applications to access operating system components and objects outside of the area of execution of the Java program used on a graphical user interface (Lewallen, col 3, lines 12-20) with Scalable Vector Graphics (col 8, line 60).

The above passages from LEWALLEN do not provide the requisite suggestion or motivation to combine MARTIN and LEWALLEN in a combination that would include the features of Claim 1 of a binding element with an attribute for referencing a database through a pointer that includes a query for a data item in the database.

As discussed above, nothing in LEWALLEN teaches or suggests that an entity (i.e. a program statement or a JDBC call) including a query to access data from a database may be a pointer stored in a binding element attribute for referencing the database. While the passage in col. 3, lines 12-24 of LEWALLEN may be describing a need for a platform that allows Java applications to access operating system components outside the area of execution of the Java applications, nothing in this or in any other passage of LEWALLEN teaches, describes, or suggests a need to bind SVG documents to data items in a database through pointers stored in binding element attributes.

Moreover, in col. 8, lines 57-61, LEWALLEN states:

Preferred embodiments exploit the fact that many current **user interfaces**, such as Mozilla browsers, Microsoft Internet Explorer version 5, **Adobe Scalable Vector Graphics**, etc., implement the W3C DOM interfaces. (Emphasis added.)

The above passage makes it clear that the term “Scalable Vector Graphics” refers to the Adobe Systems, Inc. SVG interface or browser plug-in, and NOT to an SVG document that may reference a binding element, such as the binding element featured in Claim 1. The mere mention of SVG is insufficient to suggest the specific features of Claim 1.

Furthermore, while MARTIN describes a mechanism for describing relationships between XML documents (MARTIN, page 2), LEWALLEN describes a system for implementing components of an user interface as an object (LEWALLEN, Abstract, col. 3, lines 27-31). Thus, it seems that the only suggestion or motivation to combine MARTIN with LEWALLEN is the recitation in LEWALLEN of the phrase “Scalable Vector Graphics”. It is respectfully submitted that the mere recitation of the phrase “Scalable Vector Graphics” is insufficient to suggest to one of ordinary skill in the art that a combination of MARTIN with LEWALLEN would have any desirable features, let alone include the features of Claim 1 discussed above.

For the above reasons, it is respectfully submitted that there is no suggestion or motivation to combine MARTIN with LEWALLEN.

3. HARRISON does not describe or suggest the feature of Claim 1 of binding to the SVG statements the pointer to the resource from an instance of a binding element.

The Office Action asserts that the above feature of Claim 1 is described in col. 2, lines 55-65 of HARRISON. Specifically, the Office Action asserts that linking the supplementary data to one of the model components based on tag data associated with the selected image corresponds to binding a pointer to SVG statements as featured in Claim 1. This is incorrect.

LEWALLEN expressly describes that the supplementary data is basically annotations “added to a drawing data file and associated with a particular structural feature of a model without requiring access to the model document or model component documents.” (LEWALLEN, col. 3, lines 20-24.) “These **annotations include, e.g., symbols indicating surface finishes and weld points, text notes, dimension measurements, and other types of supplementary data (i.e., data supplementing that found in the model and/or model**

**component documents**). Annotations may be attached to particular edges, vertices, faces, or other model elements visible in a drawing.” (LEWALLEN, col. 4, lines 40-46; emphasis added.) Since annotation data is NOT equivalent neither to a pointer to a resource nor to SVG statements, no operation with the supplementary (annotation) data in LEWALLEN can be equivalent to the feature of Claim 1 of binding to SVG statements a pointer to a resource.

Furthermore, Claim 1 recites that the pointer to the resource is included in an attribute of an instance of a binding element. Nothing in LEWALLEN teaches, describes, or suggests that supplementary data or tag data is stored or maintained in an attribute of an instance of a binding element. For example, in col. 2, lines 51-65, LEWALLEN states:

The method includes processing the drawing document to display the view of a design model on a computer display terminal, receiving a user input selecting one of the image elements, receiving supplementary data, and linking the supplementary data to one of the model components based on the tag data associating the selected image element with the first model component. Implementations may include one or more of the following features. The model components may be interrelated by a hierarchical data structure in which the hierarchical relationships detail a construction of the modeled object. The hierarchical data structure may be a tree structure that includes parent-child relationships between the model components.

The above passage describes a method for displaying the view of a design model on a computer screen by receiving supplementary data (e.g. image element annotations), receiving user input that selects an image element of the model, and thereafter linking the supplementary data to a model component based on tag data associating the selected image element with the model component. Thus, while the above passage may be describing a mechanism for associating supplementary data with design model components, the above passage has nothing to do with binding to SVG statements a **pointer to a resource from an instance of a binding element**, as featured in Claim 1.

For the above reasons, it is respectfully submitted that HARRISON, SALL, MARTIN, and LEWALLEN, whether taken alone or in combination, do not teach all features of Claim 1.

Thus, Claim 1 is patentable under 35 U.S.C. §103(a) over HARRISON, SALL, MARTIN, and LEWALLEN. Reconsideration and withdrawal of the rejection of Claim 1 is respectfully requested.

B. CLAIMS 23, 26, AND 29

Claims 23, 26, and 29 have been rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over HARRISON in view of SALL, and further in view of MARTIN.

All of Claims 23, 26, and 29 include features similar to the features of Claim 1 discussed above. For this reason, Claims 23, 26, and 29 are patentable under 35 U.S.C. § 103(e) over HARRISON in view of SALL, further in view of MARTIN, and further in view of LEWALLEN for at least the reasons given above with respect to Claim 1. Reconsideration and withdrawal of the rejections are respectfully requested.

C. DEPENDENT CLAIMS 5-7, 9-16, 18-22, AND 32-33

Claims 6-7, 10-12, 14-15, 18-22, and 32-33 have been rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over HARRISON in view of SALL, and further in view of MARTIN. Claims 5, 13, and 16 have been rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over HARRISON in view of SALL, further in view of MARTIN, further in view of LEWALLEN, and further in view of Chithambaram et al., U.S. Patent No. 6,674,445 (“CHITHAMBARAM”). Claim 9 has been rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over HARRISON in view of SALL, further in view of MARTIN, and further in view of Sorge et al., U.S. Patent No. 6,565,609 (“SORGE”).

Each of Claims 5-7, 9-16, 18-22, and 32-33 depends from independent Claim 1, and thus includes each and every feature of the independent claim. Furthermore, in rejecting Claims 5, 9, 13, and 16 the Office Action relies explicitly on HARRISON, SALL, MARTIN or LEWALLEN, and not on any of the other references (CHITHAMBARAM or SORGE), to support prior



disclosure of the features discussed above with respect to Claim 1. Thus, since as shown above HARRISON, SALL, MARTIN, and LEWALLEN fail to teach all features of Claim 1, any combination of HARRISON, SALL, MARTIN, and LEWALLEN with the other references necessarily fails to teach all features of dependent Claims 5-7, 9-16, 18-22, and 32-33. Therefore, each of claims 5-7, 9-16, 18-22, and 32-33 is allowable for the reasons given above for Claim 1. In addition, each of Claims 5-7, 9-16, 18-22, and 32-33 introduces one or more additional features that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those limitations is not included at this time. Therefore, it is respectfully submitted that Claims 5-7, 9-16, 18-22, and 32-33 are allowable for the reasons given above with respect to Claim 1.

### III. CONCLUSION

The Applicant believes that all issues raised in the Office Action have been addressed. Further, for the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

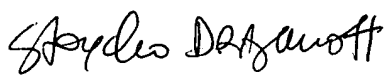
To the extent necessary to make this reply timely filed, the Applicant petitions for an extension of time under 37 C.F.R. § 1.136.

If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

HICKMAN PALERMO TRUONG & BECKER LLP

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Stoycho D. Draganoff  
Reg. No. 56,181

2055 Gateway Place, Suite 550  
San Jose, CA 95110 - 1089  
Telephone: (408) 414-1080 ext. 208  
Facsimile: (408) 414-1076